

### Comments on Oklahoma's 1915(b)(4) NET waiver

1. Page 2, II.B. – Please correct the following typographical error. The two-year waiver will end on 12-31-04, rather than 12-31-05.
2. Page 10, second paragraph. – We do understand that the State is still going through the RFP process; however, the second paragraph requests that the State specify the number of vehicles per contractor per county to assure sufficient capacity under the waiver. Please provide this information.
3. Page 11, 4. – As was stated previously, we do understand that the State is still going through the RFP process; however, in this section, we request that the State provide the average expected number of vehicles per beneficiary for each geographical area or county of the program and then the statewide average. How does this number differ from the present system? Please provide this information.
4. Page 13, 3.(a). – Please check off 3.(a) since this program is mandatory for the populations outlined in Section II.I.
5. Page 14, III.D.5. – Please check off 5.(b) since the State will not allow enrollees to disenroll from the PHP.
6. Page 21, 3.b. – In this section, we request that the State provide a brief explanation in Appendix V.C.3.(b) of each cost item listed as an administrative cost. Please provide this explanation.
7. Page 30, Appendix II.G.4. – There is a typographical error. In the sentence, “This will enable the State to contract with! broker”, it should read **with 1 broker**. Also, please indicate that the State requests approval to waive the choice provision to prevent enrollees from disenrolling from the program.
8. Page 31, Appendix II.J.9. The State excludes four populations from the waiver. Where will populations (1) – (4) receive non-emergency transportation services, particularly Medicaid beneficiaries under the fully capitated health maintenance organization?
9. Page 32, Appendix II.K.5. – How will the State reimburse for alternate services including paratransit, bus fare, and vehicle mileage?
10. Page 33, Appendix II.K. – Under Part C, please indicate to the best of your knowledge whether or not the new NET system will impair access in any manner.
11. Page 35, Appendix III.A.3.(b). – The first paragraph under this section indicates that before a broker can begin operations, the broker must meet and adhere to the

requirements of the ADA and the RFP. How will the State ensure that these provisions are met?

12. Page 41, Appendix IV.C.1. – For this appendix, the State needs to describe how they monitor access for the listed items.
13. Page 42, Appendix IV.C.1. Will the Broker account for 72 hours of advance notice in terms of business or actual hours?
14. Page 42, Appendix IV.C.1.c. – The second paragraph indicates the OHCA will monitor reports produced from the Broker’s tracking software. What type of reports will be monitored?
15. Page 43, Appendix IV.D. – What criteria will the Broker use to justify a denial or termination of service?
16. Page 50, Appendix D. – The purpose of the section 1915(b)(4) waiver program is to provide States the flexibility to selectively contract with a broker to provide the most efficient and effective transportation program, while ensuring access to quality medical services. Although OHCA finds no differences in the standards that providers must meet under the waiver than from those in the state plan, please justify how the broker arrangement is the most efficient and effective mode of transportation.

### **Cost- Effectiveness Questions**

1. We have reviewed your draft spreadsheet on developing a reasonable trend factor. The State made future growth projections using a trend factor in the range of 12 to 33 percent. The calculations were based upon either total expenditures or total PMPM. However, this calculation may be inaccurate.

We were advised that the nursing home eligibles were not able to participate until May 2001. Since the nursing home eligibles were not included in the SFY 2000 expenditure or PMPM, a smoothing factor should be applied to balance SFY 2000 in your calculations.

We figured a more reasonable estimate for the trend factor may be around 7 to 10.5 percent. We smoothed out the data from SFY 2000 PMPM by applying a nursing home rate factor of 2 and 8.82 percent to develop the trend factor.

Please re-evaluate without waiver costs, and submit your analysis for our review. If you decided not smooth out data, then please describe your methodology in detail.

2. How does the State compute the average annual growth rate, as indicated in the Excel spreadsheet. Please review formulas in specific cells labeled “average annual growth rate”?

3. During our conference call, the State indicated that the contract with the Metropolitan Tulsa Transit Authority has a cost-plus arrangement. Why does the State effectively build-in profit for a not-for-profit entity? Please provide a copy of the approved contract for our review.
4. Given that the New Fiscal Agent starts January 1, 2003, will any additional administrative costs be incurred?